## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:		) Bankr. No. 15-24752 CMB
	JEWEL J. OUTLAW,	)
		) Chapter 13
	Debtor.	)
		) Docket No. 62
	PNC BANK, N.A.,	) Related to Docket No.
		)
	Movant,	) Hearing Date & Time:
		)
	vs.	) Claim No. 15
		)
	JEWEL J. OUTLAW AND	)
	RONDA J. WINNECOUR, ESQ.,	)
	Respondents.	)
	<b>DECLARATION OF MO</b>	RTGAGE PAYMENT CHANGE

And Now, comes the Debtor, Jewel J. Outlaw, by and through her attorney, who respectfully represents the following:

- 1. On or about December 31, 2015, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
- 2. This Notice is being filed to notify the Chapter 13 Trustee of the changed payment for the November distribution.
- 3. PNC Bank, NA has filed a Notice of Mortgage Payment Change. The monthly mortgage payment of \$613.16 is being increased to \$617.05 effective 12/1/2017.

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment in amount that becomes effective on 12/1/2017.

Respectfully submitted.

/s/ Rodney D. Shepherd
Rodney D. Shepherd, Esquire
Attorney for the Debtor
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## **CERTIFICATE OF SERVICE**

I, Rodney D. Shepherd, attorney for the debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 7<sup>th</sup> day of November, 2017, by Electronic Filing and U.S. Mail, first class, postage pre-paid, upon the following:

Ronda J. Winnecour, Esquire Chapter 13 Trustee cmecf@chapter13trusteewdpa.com PNC Bank, N.A. Attn: James C. Warmbrodt, Esquire KML Group, P.C. 701 Market Street, Suite 5000 Philadelphia, PA 19106

By: /s/ Rodney D. Shepherd Rodney D. Shepherd Attorney for the Debtor PA I.D. No. 56914 rodsheph@cs.com 2403 Sidney Street Suite 208 Pittsburgh, PA 15203 412 471-9670